

WHITE AND WILLIAMS, LLP  
One Penn Plaza, Suite 4110  
New York, NY 10119  
Telephone: (212) 631-4421  
Karel S. Karpe, Esq.  
and  
BIALSON, BERGEN & SCHWAB  
2600 El Camino Real, Suite 300  
Palo Alto, California 94306  
Telephone: (650) 657-9500  
Lawrence M. Schwab, Esq. (*Admitted in Calif.*)  
Patrick M. Costello, Esq. (*Admitted in Calif.*)  
Thomas M. Gaa, Esq. (*Admitted in Calif.*)  
Kenneth T. Law, Esq. (*Admitted in Calif.*)

*Counsel to Sun Microsystems, Inc. and Sun Microsystems Global  
Financial Services, LLC*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:	:	Chapter 11
	:	
GENERAL MOTORS CORP., <i>et al.</i> ,	:	Case No. 09-50026 (REG)
	:	
Debtors.	:	Jointly Administered
	:	

**NOTICE OF APPEARANCE AND REQUEST FOR  
SERVICE ON BEHALF OF SUN MICROSYSTEMS, INC. AND SUN  
MICROSYSTEMS GLOBAL FINANCIAL SERVICES, LLC**

**PLEASE TAKE NOTICE** that Sun Microsystems, Inc. and Sun Microsystems Global Financial Services LLC hereby appears by their counsel White and Williams LLP and Bialson Bergen & Schwab in the above-captioned case, and counsel hereby enters appearance pursuant to the Federal Rules of Bankruptcy Procedure 2002, 9007 and 9010.

**PLEASE TAKE FURTHER NOTICE** that the undersigned requests that an entry be made on the Clerk's Matrix in this case and that all documents filed with the Court and all notices which the Court and/or any party provides in accordance with Bankruptcy Rule 2002 be

served upon the counsel set forth below:

White and Williams LLP  
One Penn Plaza, Suite 4110  
New York, New York 10119  
Attn.: Karel S. Karpe  
Telephone: (212) 631-4421  
Fax: (212) 631-4431  
Email: karpek@whiteandwilliams.com

and

Bialson, Bergen & Schwab  
2600 El Camino Real, Suite 300  
Palo Alto, California 94306  
Attn.: Patrick M. Costello  
Email: patrick@bbslaw.com  
Thomas M. Gaa, Esq.  
Email: tom@bbslaw.com  
Telephone: 650 657 9500  
Fax: 650 494 2738

This request includes without limitation all papers, reports, orders, notices, applications, motions, petitions, pleadings, disclosure statements, plans of reorganization, appendices, exhibits, requests or demands, whether formal or informal, whether written or oral, transmitted or conveyed by mail, courier service, telephone, facsimile, telegraph, telex or otherwise.

**PLEASE TAKE FURTHER NOTICE** that neither this Notice of Appearance nor any subsequent appearance, pleading, claim or suit shall be deemed or construed to be a waiver of the rights of Sun Microsystems, Inc. and Sun Microsystems Global Financial Services LLC (i) to have final orders in non-core matters entered only after *de novo* review by a District Court, (ii) to trial by jury in any proceeding so triable in these cases, controversy, or proceeding related to these cases, (iii) to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, or (iv) any other rights, claims, actions, setoffs, or recoupments to which Sun Microsystems, Inc. and Sun Microsystems Global Financial Services LLC are or may be entitled under agreements, in law or in equity, all of which rights, claims,

actions, defenses, setoffs, and recoupments are expressly reserved without exception and with no purpose of confessing or conceding jurisdiction in any way by this filing or by any other participation in these matters.

**PLEASE TAKE FURTHER NOTICE** that request is also made that counsels be added to the Official Service List, or any other creditor matrix for notice of all contested matters, adversary proceedings and other proceedings in the Chapter 11 case.

Dated: New York, New York  
June 16, 2009

WHITE AND WILLIAMS LLP

By: /s/Karel S. Karpe  
Karel S. Karpe  
One Penn Plaza, Suite 4110  
New York, New York 10119  
and  
BIALSON, BERGEN & SCHWAB  
2600 El Camino Real, Suite 300  
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*Attorneys for Sun Microsystems, Inc. and Sun  
Microsystems Global Financial Services LLC*

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	:	

**CERTIFICATE OF SERVICE OF NOTICE OF APPEARANCE  
AND REQUEST FOR SERVICE**

I, Karel S. Karpe, hereby certify that on this 16th day of June 2009, I caused the foregoing *Notice of Appearance and Request for Service* to be served on the following parties via ECF and regular mail:

Weil, Gotshal & Manges LLP  
767 Fifth Avenue, New York, NY 10153  
Attn: Harvey R. Miller, Esq., Stephen Karotkin, Esq., and Joseph H. Smolinsky, Esq.

Cadwalader, Wickersham & Taft LLP  
One World Financial Center, New York, NY 10281  
Attn: John J. Rapisardi, Esq.

The U.S. Treasury  
1500 Pennsylvania Avenue NW, Room 2312

Washington, DC 20220  
Attn: Matthew Feldman, Esq.

Vedder Price, P.C.  
1633 Broadway, 47th Floor  
New York, NY 10019  
Attn: Michael J. Edelman, Esq. and Michael L. Schein, Esq.

Kramer Levin Naftalis & Frankel LLP  
1177 Avenue of the Americas  
New York, NY 10036  
Attn: Kenneth H. Eckstein, Esq. and Thomas Moers Mayer, Esq.

Cleary Gottlieb Steen & Hamilton LLP  
One Liberty Plaza  
New York, NY 10006  
Attn: James L. Bromley, Esq.

Cohen, Weiss and Simon LLP  
330 W. 42nd Street  
New York, NY 10036  
Attn: Babette Ceccotti, Esq.

Office of the United States Trustee for the Southern District of New York  
33 Whitehall Street, 21st Floor  
New York, NY 10004  
Attn: Diana G. Adams, Esq.

U.S. Attorney's Office, S.D.N.Y.  
86 Chambers Street, Third Floor  
New York, NY 10007  
Attn: David S. Jones, Esq. and Matthew L. Schwartz, Esq.

Dated: New York, New York  
June 16, 2009

By: /s/Karel S. Karpe  
Karel S. Karpe